

EXHIBIT 11

1
2 UNITED STATES DISTRICT COURT
3 EASTERN DISTRICT OF NEW YORK

4 - - - - -x

5
6 In Re Application of FORENSIC NEWS LLC
7 and SCOTT STEDMAN for an Order Pursuant
8 to 28 U.S.C. § 1782 to Conduct Discovery
9 for Use in a Foreign Proceeding

- - - - -x

10 MDC Brooklyn - Metropolitan
11 Detention Center
12 80 29th Street
13 Brooklyn, New York 11232
14 November 2, 2022
15 10:12 a.m.

16 DEPOSITION of AVIRAM AZARI, a
17 Non-party witness in the above-entitled
18 action, held at the above time and place,
19 taken before SAMUEL HITTIN, a Shorthand
20 Reporter and Notary Public of the State of
21 New York, pursuant to the Federal Rules of
22 Civil Procedure, order and stipulations
23 between Counsel.

24 * * *

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2 APPEARANCES:
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4 GIBSON DUNN & CRUTCHER LLP
5 Attorneys for Scott Stedman
6 and Forensic News LLC
7 200 Park Avenue 47th Floor
8 New York, New York 10166

9 BY: CATHERINE McCAFFREY, ESQ.

10 AND: ERICA PAYNE, ESQ.

11 cmccaffrey@gibsondunn.com

12 MOSES SINGER
13 Attorneys for witness
14 AVIRAM AZARI
15 405 Lexington Avenue
16 New York, New York 10174
17 (212) 554-7800

18 BY: BARRY ZONE, ESQ.

19 ALSO PRESENT:
20

21 EIBER TRANSLATIONS
22 Hebrew Interpreter
23 BY: RUTH KOHN
24
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STIPULATIONS

IT IS HEREBY STIPULATED AND AGREED, by
and among counsel for the respective
parties hereto, that the filing, sealing
and certification of the within deposition
shall be and the same are hereby waived;

IT IS FURTHER STIPULATED AND AGREED
that all objections, except as to form of
the question, shall be reserved to the
time of the trial;

IT IS FURTHER STIPULATED AND AGREED
that the within deposition may be signed
before any Notary Public with the same
force and effect as if signed and sworn to
before the Court.

* * *

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2 R U T H K O H N, the interpreter,
3 having been first duly sworn, by a Notary
4 Public, interpreted the testimony as
5 follows:

6

7 A V I R A M A Z A R I, the Witness
8 herein, having first been duly sworn by
9 the Notary Public, was examined and
10 testified as follows:

11 EXAMINATION BY

12 MS. McCaffrey:

13 Q. Good morning. Thank you both
14 for being here today. My name is Cate
15 McCaffrey. I'm an attorney with the law
16 firm of Gibson Dunn & Crutcher, and I am
17 here with my colleague Erica Payne.

18 So Mr. Azari, as you know, I am
19 not your lawyer, Mr. Zone is. And this
20 deposition is not part of the criminal
21 case against you. This is a proceeding
22 where you are a third-party witness.

23 I represent Forensic News LLC
24 and Mr. Scott Stedman, and we're here to
25 ask questions about Walter Soriano who has

1 A. AZARI

2 brought a lawsuit against our client.

3 So could you please state and
4 spell your name for the record?

5 A. Aviram Azari, A-V-I-R-A-M
6 A-Z-A-R-I.

7 Q. Thank you. So Mr. Azari, have
8 you been deposed before?

9 A. No.

10 Q. Okay. So just a few logistics
11 before we start with the questions.

12 So this our translator, Ruth, as
13 you know, she'll be translating all my
14 questions and all your answers. And this
15 is our court reporter who will be writing
16 everything down, both my questions and
17 your answers.

18 Do you understand?

19 A. What's the meaning of word
20 "deposition."

21 Q. A deposition, it is not a court
22 hearing, but it is part of a civil
23 lawsuit. The court has given us
24 permission to ask you questions, which you
25 are obligated to answer under oath, and

1 A. AZARI

2 A. Fifth Amendment.

3 Q. Okay. Has USG performed worked
4 for Oleg Deripaska?

5 A. Fifth Amendment.

6 Q. Has Mr. Soriano performed work
7 for Oleg Deripaska outside of USG?

8 A. Fifth Amendment.

9 Q. Did Mr. Soriano and
10 Mr. Deripaska have a personal
11 relationship?

12 A. Fifth Amendment.

13 Q. Do they have a professional
14 relationship?

15 A. Fifth Amendment.

16 Q. Has Mr. Soriano made
17 arrangements for Mr. Deripaska?

18 A. I don't know.

19 Q. Has Mr. Soriano worked as a
20 direct consultant for Mr. Deripaska?

21 A. I don't know.

22 Q. Is Mr. Soriano -- has
23 Mr. Soriano ever communicated with
24 Mr. Deripaska?

25 A. Fifth Amendment.

1 A. AZARI

2 Q. Has USG ever made arrangements
3 with OSY Technologies?

4 A. I don't know.

5 Q. Has USG ever made Circles?

6 A. I don't know.

7 Q. Has Mr. Soriano ever personally
8 made arrangements with any of these
9 companies?

10 A. I don't know.

11 Q. Okay. I'm going to ask you
12 several questions about your involvement
13 with USG and Mr. Soriano.

14 Have you ever performed work for
15 USG?

16 A. Fifth Amendment.

17 Q. Have you ever performed work for
18 Mr. Soriano personally outside of USG?

19 A. Fifth Amendment.

20 Q. Okay. Have you ever been paid
21 by USG?

22 A. Fifth Amendment.

23 Q. Have you ever been paid by
24 Mr. Soriano personally?

25 A. Fifth Amendment.

1 A. AZARI

2 Q. Has USG ever made payments to
3 Aviram Hawk Consultants?

4 THE INTERPRETER: To whom?

5 MS. McCAFFREY: Aviram Hawk
6 Consultants.

7 A. Fifth Amendment.

8 Q. Has Mr. Soriano personally made
9 payments to Aviram Hawk Consultants?

10 A. Fifth Amendment.

11 Q. Has USG ever made payments to
12 Panolos?

13 A. Fifth Amendment.

14 Q. Has Mr. Soriano personally made
15 payments to Panolos?

16 A. Fifth Amendment.

17 Q. Are you affiliated with any LLCs
18 in Israel?

19 A. Fifth Amendment.

20 Q. Are you affiliated with an LLC
21 in the Grenadines?

22 A. Fifth Amendment.

23 Q. Are you affiliated with an LLC
24 in Cyprus?

25 A. Fifth Amendment.

1 A. AZARI

2 Q. Are you affiliated with an LLC
3 in Panama?

4 A. Fifth Amendment.

5 Q. Do you need more food? Do you
6 need to take a break?

7 [Discussion held off the
8 record.]

9 MS. McCAFFREY: Back on the
10 record.

11 Q. Did USG make payments to Aviram
12 Hawk in 2012?

13 A. Fifth Amendment.

14 Q. Did USG make payments to Aviram
15 Hawk in 2013?

16 A. Fifth Amendment.

17 Q. Did USG make payments to Panolos
18 in 2012?

19 A. Fifth Amendment.

20 Q. Did USG make payments to Panolos
21 in 2013?

22 A. Fifth Amendment.

23 Q. Did USG make payments to Aviram
24 Hawk or Panolos in relation to work done
25 for Dmitry Rybolovlev?

1 A. AZARI

2 A. Fifth Amendment.

3 Q. Did USG make payments to Aviram
4 Hawk or Panolos for work performed for
5 Oleg Deripaska?

6 A. Fifth Amendment.

7 Q. Same question for Abramovich?

8 A. Fifth Amendment.

9 Q. Did USG ever sign a written
10 contract with Aviram Hawk?

11 A. Fifth Amendment.

12 Q. Did USG ever enter a contract
13 with Panolos?

14 A. Fifth Amendment.

15 Q. Did USG ever enter a contract
16 with you personally?

17 A. Fifth Amendment.

18 Q. Okay. Did you ever perform work
19 for USG?

20 A. Fifth Amendment.

21 Q. Did you ever perform work for
22 Mr. Soriano personally?

23 A. Fifth Amendment.

24 Q. Did you ever engage in hacking
25 on behalf the USG?